

Docket No. A2011-68

Postal Regulatory Commission

Washington, D.C. 20268-0001

NOTICE OF FILING UNDER 39 U.S.C. § 404(d)

TO THE UNITED STATES POSTAL SERVICE:

Please take notice that on September 8, 2011, the Commission received a petition for review of the Postal Service's determination to close the Board Camp post office located in Board Camp, Arkansas. The petition for review was filed by the Residents and Customers of Board Camp, Arkansas (Petitioner) and is postmarked August 29, 2011.

This notice is advisory only and is being furnished so that the Postal Service may begin assembling the administrative record in advance of any formal appeal proceedings held upon the alleged (closing/consolidation) for transmittal pursuant to 39 CFR § 3001.113(a) (requiring the filing of the record within 15 days of the filing with the Commission of a petition for review). The Postal Service's administrative record is due no later than September 23, 2011.



Ruth Ann Abrams
Acting Secretary

Date: September 12, 2011

Attachment

SEP 2 2011

August 27, 2011

This letter is a request for an APPEAL and PETITION for review of the Postal Service's Final Determination to close the Board Camp, AR, Post Office, DOCKET NUMBER: 1355306-71932.

RECEIVED

2011 SEP -7 P 1:56

We, the undersigned residents and customers of the Board Camp, AR Post Office, feel that the Postal Service did NOT take all available information into consideration in its Final Determination, nor did it make a full financial disclosure to the public of all possible economic factors. In light of the information stated in this letter, we do hereby respectfully petition the Postal Regulatory Commission to INSTITUTE REASONABLE ALTERNATIVES TO CLOSURE as suggested in this letter, for at least a ONE YEAR TRIAL PERIOD, and CEASE AND DESIST this closure at this time.

The closure of the Board Camp Post Office is an example of 'throwing the baby out with the bath water', in other words, eliminating all that is positive by eliminating the negative. This is NOT good stewardship of resources, in the name of cutting expenses! The Postal Service is taking OVERT and UNREASONABLE action (closure or "throwing out the baby") rather than taking REASONABLE steps to eliminate the negative (by reducing operational costs through reasonable means which are suggested below).

I. CONSIDERED AND DISCLOSED TO PUBLIC:

A1. POSTAL SERVICE CLAIM in Part IV Economic Savings: The Postal Service estimates an annual savings of \$49,314 for the Post Master's salary.

A2. PUBLIC REBUTTAL AND SUGGESTION: The Post Master's position HAS NOT been filled since 2009. The current Officer in Charge, who has primarily served there for 2 years, draws a salary of approximately \$25 per hour, serving 36 hours per week plus mileage from Glenwood. Rather than closing the facility completely, a REASONABLE solution might be: to REDUCE the hours that the Board Camp Post Office counter is open. A REASONABLE suggestion is: reduce the current 36 hours per week to 9 hours per week (opening the counter 9 am to Noon, Mon, Wed and Fri) and send a staff member from the Mena Post Office to serve 9 hours per week, which at \$25/hour is only \$10,800 per year (in this case mileage would not be paid). A substantial savings in staff salary is realized, reduced by 75%, and the Board Camp community is still able to be served!

B1. POSTAL SERVICE CLAIM in Part IV Economic Savings: The Postal Service estimates an annual savings of \$1500 for lease costs.

B2. PUBLIC REBUTTAL AND SUGGESTION: The lease is ONLY \$125 per MONTH! This is an extremely LOW cost for 'rent' in the area! In Polk County, the average cost to rent or lease a commercial building of this size is currently approximately \$500 per month! The cost of \$125 per month is a substantial savings over a similar leased facility, and the Board Camp community is still able to be served!

C1. POSTAL SERVICE CLAIM in Part II Effect on Community: The Postal Service concludes that, "based on the information obtained in the course of study of this discontinuance study... this final determination will not adversely affect the community." The following considerations challenge that statement:

II. NOT CONSIDERED NOR DISCLOSED TO THE PUBLIC:

A. REASONABLE ALTERNATIVES TO CLOSURE: The Postal Service did not suggest or even try to make reasonable alternatives to closure, even for a trial period, so see if such alternatives were viable to its budgetary challenges. Instead, the Postal Service is taking an overt stand to close the facility.

B. LIFE OF BUILDING: The Postal Service did not disclose a life-cycle benefit cost analysis of the building. If so, then it would reveal the following. The building (approximately size of 672 sq. ft.) was built in 1996 at an estimated cost of \$100,000. It is currently 15 years of age, but the ASTM (American Society for Testing and Materials) standard projected useful life span of a non-residential building is an average of 75 years! This building has 60 more years of estimated service left, to be used by the community! If the building was built today, using ASTM standard building cost estimate index of 7% increase per year calculated from

1996, to erect this building today would cost **\$257,533.00!** To abandon this building after only 15 years, with a life span of 60 additional years, is a substantial loss and **NOT** at all cost effective!

C. **IMPACT ON RURAL DELIVERY DRIVER TO ADD MORE CUSTOMERS TO EXISTING ROUTE:** The postal service did not study or disclose the costs or affects of adding 42 more customers (former box holders) to the carrier's route traveling on rural dirt roads. This is an increase in payroll due to added time, extended delivery time (to include delayed delivery due to the added customers), increased fuel costs, and additional wear and tear on the vehicle, to access boxes on rural unpaved roads. If the rural driver, could make **ONE** stop, at the Board Camp Post Office facility to deliver mail to those 42 box holders, instead of adding 42 stops to the route, this would save both time and costs!

D. **IMPACT ON POST OFFICE BOX HOLDERS:** Board Camp Post Office currently rents 42% of its boxes to a community of approximately 450 households. Mena Post Office currently rents 64% of its boxes to a community of 2,771 households. In Board Camp, 1 in 10 people rent a post office box. In Mena 1 in 38 people rent a box. Comparing communities, the **NEED** for post office boxes in Board Camp is almost **4 times greater** than in Mena. If the rental rate of the current number of rented boxes (42) were raised by \$3 per month, that alone would cover the cost of the annual lease! (Note: there were 50 boxes rented before news of closure!)

E. **FINANCIAL IMPACT ON THE BOARD CAMP COMMUNITY:** The Postal Service estimated 25 transactions per day at the Board Camp Post Office. If these customers, due to the nature of their business, do **NOT** find it convenient to use the rural carrier services for their transactions, but drive to the Mena Post Office, which is 9.2 miles away (not 7 miles as the Postal Service stated) to transact business, then those 25 customers make a 18.4-mile round-trip each, which equals 460 customer-driven miles per day. The estimated gasoline expense at \$3.58 per gallon (as of August 18), assuming customer vehicles average 25 miles per gallon, cumulative customer expense is \$65.87 per day. This amounts to an expense of \$19,761.00 in fuel costs in one year (at 300 mail delivery days per year) to commute to the Mena Post Office, compared to \$1,500.00 in one year to continue to lease the building! This does not include the 42 customers who rent boxes who will have to drive to Mena to check their mail, if they desire a post office box instead of rural delivery. This also does not include the extra time each customer must spend to travel to Mena to conduct post office business.

F. **FINANCIAL IMPACT ON THE FUTURE:** The Postal Service did not study nor report future population growth in Polk County and the impact of that growth with the Postal Service. The population of Polk County is only 26% urban, and 74% rural! To close the rural post offices is ludicrous when $\frac{3}{4}$ of the county's population is rural! Polk County's population (as well as the State of Arkansas) has steadily increased since 1960. Population growth of Polk County was 2.1% from 2000-2010, and at that rate, will increase by 12.6% over the next 60 years. If another post office in Board Camp is needed **BEFORE** the useful life of the building expires in 60 more years, the future costs to build a new building at the current index (as stated in item B) will be astronomical compared to the current costs of keeping the building! Postal services should be **EXPANDING** in preparation for continued population growth in Rural America, not **DECLINING**!

The above facts and considerations prove that it is more cost effective to leave the post office open to the public than close it! Please consider and utilize these proposals to make the post office economically viable for at least a trial period of one year:

1. **CLOSED ON SATURDAYS** with no mail delivery in the community.
2. **OPEN THE COUNTER 9 HOURS PER WEEK**, as opposed to the current 36 hours per week. Open 9 am to Noon, Mon, Wed and Fri (transactions will increase by 75% on those days).
3. Allow the rural carrier to deliver mail to the post office boxes 5 days per week, **MAKING ONE STOP**, thus saving the rural carrier additional hours, and wear and tear on vehicle, in delivering mail to 42 added rural route boxes in the Board Camp community.

Signed and respectfully submitted by the Residents and Customers of Board Camp, AR Post Office (please see attached pages for signatures)

We, the undersigned RESIDENTS of the community of BOARD CAMP, ARKANSAS, agree with the attached letter, "APPEAL and PETITION for review of the FINAL DETERMINATION TO CLOSE THE BOARD CAMP, AR, POST OFFICE, DOCKET NUMBER: 1355306-71932", and do hereby respectfully petition the Postal Regulatory Commission to INSTITUTE REASONABLE ALTERNATIVES to closure as suggested in this letter, for at least a ONE YEAR TRIAL PERIOD, and cease and desist this closure at this time, dated August 27, 2011.

NAME	MAILING ADDRESS	CITY
Henry Murphy		Board Camp
Cindy Brevik		Mena
Lynn Chiles		Board Camp
Barbara Chiles		B. C.
Yocana Baptist Church		B. C.
Danny Gassoff		B. O. 3 P. 455
Sue Tables		Board Camp
Minnie Table		" " AR
Marj M. Head		Mena AR
Julia Bentley		Mena AR
Debra Thompson		Mena AR
Kathleen Werkhavan		Mena AR
Jack Esarey		BC 71932
Amiey Werkhavan		Mena
Larry Eaker		MENA
Dorcas Brevik		Mena AR
Lori Densmore		Mena AR
Allen Brundage		Mena AR
Theodore F. Harris		MENA AR
Margaret Harris		Mena, Ar.
Janis - Farley		Mena Ar

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NAME	MAILING ADDRESS	CITY
Darryl Smith		Board Camp
King Rogers		Board Camp
Rosanne Rob		Board Camp
Donna Offinson		Board Camp
Marianne Berles		Board Camp
Gerard Lewis		Board Camp
Gene Ross		BOARD CAMP
Jayce Rana		BOARD CAMP
Larry Erickson		Board Camp
Travis Erickson		BC
Sherry Erickson		Board Camp
Myra Thorne		Board Camp
Una Anglin		Mena
Jeffery		MENA
Peggy Young		Mena
Tammie Payne		Mena
Larry Erman		Mena
Robert J. Smith		BOARD CAMP
Shirley Steiner		BOARD CAMP
J E Hedges Sr.		Mena
Barbara Hedges		Mena

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